



# Washington's Hazardous Waste and Toxics Reduction Program

Step by Step Fact Sheet for Hazardous Waste Generators

## Hazardous Waste Generator Checklist

Does your business or organization generate hazardous waste? A **hazardous waste** is a solid, liquid or gaseous material with certain properties that could pose dangers to human health or the environment. This 10-step checklist will help you determine if your business produces hazardous wastes and it summarizes your responsibilities if you do.

At first glance, some of the requirements below may seem difficult to understand or follow. We understand this and want to help. Ecology staff can provide further information on the details of meeting your responsibilities as a generator. Ask them for copies of the more detailed Checklist Fact Sheets that correspond with each of the ten sections of the Checklist. They can also provide:

- ☒ **Hazardous Waste Fact Sheets** for certain industries with practical "do's" and "don'ts" for handling different wastes,
- ☒ a **Glossary** of terms used in this checklist and in other fact sheets,
- ☒ a **Subject Index** with references and contacts for many of your hazardous waste questions, and
- ☒ a **Services Directory** to help you find waste haulers, laboratories, recyclers, and other services.

While the Checklist covers important sections of the *Dangerous Waste Regulations* (Chapter 173-303 WAC), it does **not** replace them. Always refer to the regulations themselves for more detail or call a hazardous waste specialist at your nearest Ecology regional office. If you follow the Checklist point for point, you are well on your way to meeting the major requirements for compliance.

The first section allows you to determine if your business produces hazardous waste. If you mark "yes" to **any** of the categories under section 1, you are a generator of hazardous waste and should continue reading the checklist. You can find some of the information about your waste on your product's **Material Safety Data Sheet**.

### 1 Identify your waste and generator requirements.

- ☐ One or more of my wastes is on Washington's **discarded chemical products or dangerous waste sources** "lists" (see Chapter 173-303-9903 and -9904 of the *Dangerous Waste Regulations*).
- ☐ One or more of my wastes is

**ignitable** (flash point of 140° F or less. Example: *acetone*).

Yes No

☐ I have a **corrosive** waste (pH less than 2 or greater than 12.5. Example: *sodium hydroxide*).

Yes No

☐ I have a waste that is **reactive** (could explode, generate harmful vapors, or is an oxidizer. Example: *cyanides*).

Yes No

☐ One of my wastes is hazardous under the **toxicity characteristic**.

Yes No

☐ One of my waste mixtures is a criteria waste because it is **toxic or persistent** (see WAC 173-303-100. Examples: *trichloroethylene (TCE)*, *coal tar*).

Yes No

If you checked yes to **any** of the above categories, you are a generator of hazardous waste. You must now determine whether you are a **"fully regulated generator"** or **"small quantity generator"** by completing the next few steps in this section. Refer to Checklist Fact Sheet 1 and the Glossary for additional assistance in identifying your hazardous wastes and generator requirements.

☐ I have identified those hazardous wastes which are designated as an Extremely Hazardous Waste (EHW) and those which are Dangerous Waste (DW).

☐ I have identified the Quantity Exclusion Limit (QEL) for each of my hazardous wastes as either 2.2 pounds or 220 pounds. The QEL is the amount used to determine if you are a small quantity generator or a fully regulated generator. On a monthly basis, you may generate waste up to the QEL before becoming a regulated generator.

☐ I routinely or occasionally **generate** (per month) or **accumulate** on-site (at any one time) hazardous waste in excess of its QEL or the accumulation limit. Remember: Add up the amounts of all wastes with the same QEL to see if the total exceeds that QEL or the accumulation limit. *Typically, if you generate more than 220 pounds per month (or about half of a 55-gallon drum), you are a fully regulated generator and should check off all remaining boxes in sections 2 through 10.*

☐ I always **generate** (per month) hazardous wastes below the QELs. I always **accumulate** on-site (at any one time) less than 2.2 pounds of a waste with a 2.2 pound QEL and less than 2200 pounds of wastes with a 220 pound QEL. *Typically, if you generate less than 220 pounds per month (or about half a 55-gallon drum), you are a small quantity generator and should complete sections 1 and 8. If you have*

*a RCRA Site identification number, then you should also complete section 3. Ecology encourages you to review the entire checklist. Remember: the moment you exceed the QEL or the accumulation limit you become responsible for all sections of the checklist.*

### 2 Obtain a RCRA site identification number.

- ☐ I have (or have applied for) a RCRA Site Identification Number.
- ☐ I notify Ecology (using **Form 2**) when I make any changes in hazardous waste activity, business name and ownership, or business location. (It is okay to use the Verification Form to report business name change.)

### 3 Report annually.

- ☐ I submit an annual report to Ecology by **March 1** of each year that documents my previous year's hazardous waste generation, accumulation, on-site recycling, or other management practices.

### 4 Perform preventive maintenance.

- ☐ I handle hazardous waste in a way that prevents leaks, spills, fires and explosions.
- ☐ I have notified local authorities (fire, police, local hospitals, building inspectors) of the hazardous wastes generated at my site(s), as well as facility layout(s) and access routes.
- ☐ I maintain an active communication or **alarm system** to signal an emergency for facility personnel.
- ☐ I have immediate access to a phone or two-way radio to summon outside assistance in an emergency.
- ☐ I maintain a ready supply of special **fire control equipment**, such as foam, inert gas or dry chemicals.
- ☐ I regularly test and maintain all emergency equipment, such as alarm systems and fire control equipment.
- ☐ I obtain a **fire department inspection** once a year.
- ☐ I follow a written schedule for regular inspections of all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that help prevent, detect or respond to hazards to the public health or the environment.

## 5 Properly accumulate hazardous waste.

- ☐ If my container accumulation area was constructed after **September 30, 1986**, I have a system capable of collecting and holding spills and leaks.
- ☐ All containers are marked with the words "hazardous or dangerous waste", an easily understood description of the waste, the date waste was first placed in the container, and the hazards associated with the waste.
- ☐ If I generate more than 220 pounds (per month) **and** accumulate on-site less than 2,200 pounds of hazardous waste, my waste is transported within **180 days** of the date the waste was first placed in a container.
- ☐ If I generate (per month) **or** accumulate on-site more than 2,200 pounds of hazardous waste, my waste is transported within **90 days** of the date the waste was first placed in a container.

## 6 Plan for emergencies.

- ☐ At all times I have an emergency coordinator on the premises or on call.
- ☐ I post the following information next to all emergency communication devices: name and telephone number of emergency coordinator; location of fire extinguishers, spill control material and fire alarm; and telephone number of fire department.
- ☐ I report all spills into the environment to the nearest Ecology regional office.
- ☐ I ensure that all my employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their day-to-day responsibilities.

If I generate per month or accumulate more than 2,200 pounds of hazardous waste, I also comply with the following:

- ☐ I have on premises a **written training plan** that tracks past and future emergency training for each employee.
- ☐ I have provided local authorities (and keep on premises) a **written contingency plan** outlining employee roles during an emergency, the location of all emergency equipment, and a personnel evacuation plan.

If you have special accommodation needs or want more information, call the Hazardous Waste and Toxics Reduction Program at (360)407-6700 (Voice) or (360) 407-6006 (TDD)

## 7 Use proper containers & manage them correctly.

- ☐ My reactive and ignitable wastes are stored in a manner equivalent with the **Uniform Fire Code**.
- ☐ Wastes are accumulated in compatible, sturdy, leak-proof, closed containers.
- ☐ All containers are visible for inspection, which is conducted at least weekly.
- ☐ I maintain a minimum of **thirty inches** of aisle space between container rows.
- ☐ I do not accumulate incompatible wastes in the same container or in the same area.

## 8 Arrange for proper transportation & disposal.

- ☐ I package, label, and mark all containers in accordance with DOT regulations prior to shipment.

If I am a **small quantity generator**:

- ☐ I ensure delivery to a facility approved in the Local Moderate Risk Waste Plan, such as a:
  - permitted hazardous waste management facility;
  - municipal or industrial solid waste facility, with local health department approval; or
  - legitimate recycler.

If I am a **regulated generator**:

- ☐ I always select a transporter who has a RCRA Site Identification Number.
- ☐ I carefully select a permitted hazardous waste treatment, storage and disposal or recycling facility, or a legitimate recycler, to handle my wastes.

## 9 Manifest shipments of hazardous waste.

- ☐ When I ship waste to a Washington State facility, I use **Uniform Hazardous Waste Manifest Form 8700-22**.
- ☐ When I ship to an out-of-state facility, I check to see if I must use that state's hazardous waste shipping manifest.
- ☐ I fill in the manifest completely and clearly.
- ☐ Before the transporter leaves my site with my waste, I check all manifest information for accuracy, even if the transporter has completed the manifest for me.
- ☐ If my waste is restricted from land disposal, I verify that a **land disposal restriction certificate** is attached to the manifest.
- ☐ If I haven't received a signed manifest back from the receiving facility within **45 days** of pick up, I file an **exception report** with Ecology.

## 10 Keep records of hazardous waste activity.

- ☐ I keep results from **laboratory tests** on my wastes.
- ☐ I keep copies of annual reports, all shipping manifests, land disposal restriction certificates, notification forms and exception reports for a minimum of **five years**.
- ☐ I keep an **inspection log** on site.
- ☐ If I conduct on-site recycling, I keep a log recording dates, recycled amounts, and make-up amounts.

## Department of Ecology Regional Offices

### Southwest Regional Office

300 Desmond Drive  
Post Office Box 47775  
Olympia, WA 98504-7775

### Northwest Regional Office

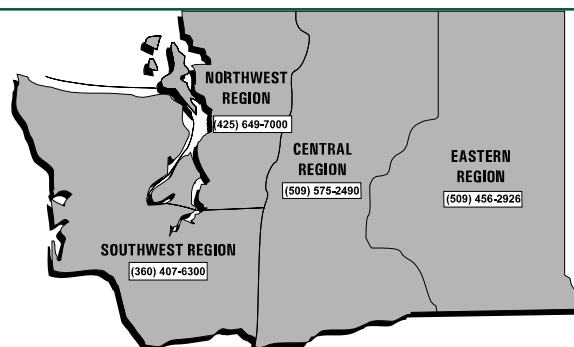
3190 160th Avenue SE  
Bellevue, WA 98008

### Central Regional Office

15 W. Yakima Avenue  
Yakima, WA 98902-3401

### Eastern Regional Office

North 4601 Monroe, Suite 202  
Spokane, WA 99205-1295



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